

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION**

KARL KENDALL, SUZANNE RAINEY  
and VINCENZO PERNICE, individually and on  
behalf of those similarly situated,

Plaintiffs,

v.

PHARMACEUTICAL PRODUCT  
DEVELOPMENT, LLC, BOARD OF  
DIRECTORS OF PHARMACEUTICAL  
PRODUCT DEVELOPMENT, LLC, THE  
BENEFITS ADMINISTRATIVE COMMITTEE,  
and JOHN DOES 1-30.

Defendants.

Civil Action No. 7:20-cv-00071-D

**PLAINTIFFS KARL KENDALL, SUZANNE RAINEY, AND VINCENZO PERNICE’S  
UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION  
SETTLEMENT, PRELIMINARY CERTIFICATION OF SETTLEMENT CLASS,  
APPROVAL OF CLASS NOTICE, APPROVAL OF PLAN OF ALLOCATION, AND  
SCHEDULING OF A FAIRNESS HEARING**

Plaintiffs Karl Kendall, Suzanne Rainey, and Vincenzo Pernice (collectively, “Plaintiffs”), participants in the Pharmaceutical Product Development, LLC Retirement Savings Plan (the “Plan”), respectfully submit this Unopposed Motion for Preliminary Approval of Class Action Settlement Agreement entered into with Defendants<sup>1</sup> (the “Settlement” or “Settlement Agreement”), Preliminary Approval of Class Notice, Approval of Plan of Allocation, and Scheduling of a Fairness Hearing (“Motion for Preliminary Approval) and respectfully move this Court for an Order granting the relief sought. The grounds for this motion are set forth in Plaintiffs’

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<sup>1</sup> “Defendants” refers, collectively, to Pharmaceutical Product Development, LLC (“PPD”), Board of Directors of Pharmaceutical Product Development, LLC (the “Board”), and The Benefits Administrative Committee (the “Committee”).

and their Counsel's declarations and the memorandum of law in support of this motion, which are submitted herewith.

A Proposed Order is submitted herewith.

Dated: March 31, 2022

Respectfully submitted,

**CAPOZZI ADLER, P.C.**

/s/ Mark K. Gyandoh

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Counsel for Plaintiffs and  
the Putative Class

**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2022 a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/ Mark K. Gyandoh  
Mark K. Gyandoh, Esq.